

Jared Manning

E. RUSSELL VETTER
SENIOR CITY ATTORNEY

SALT LAKE CITY CORPORATION

LAW DEPARTMENT

RALPH BECKER
MAYOR
EDWIN P. RUTAN, II
CITY ATTORNEY

November 17, 2011

Kent L. Jones
State Engineer
Utah Division of Water Rights
1594 W. North Temple Suite 220
P.O. Box 146300
Salt Lake City, UT 84114-6300

Re: *Litigation Hold – Starshemia Brown et al. v. State of Utah, Salt Lake City Corp., et al., Third Judicial District Court, State of Utah, Civil No. 110914230*

Dear Mr. Jones:

A review of Salt Lake City's police records indicates that you may have been involved with or have knowledge of a search and rescue involving the drowning death of an eight-year-old boy, Trejon Fite (Starshemia Brown's son), that occurred at approximately California Ave. and Redwood Road. On June 13, 2009, Trejon Fite allegedly fell while walking on a pipe crossing the Jordan River or a canal adjacent to the Jordan River. His body was recovered on August 1, 2009 in the Great Salt Lake. As a result of this accident, the City has been named in a lawsuit.

Utah law requires that if litigation is anticipated, the parties involved are required to place a "litigation hold" on all records concerning the anticipated litigation. We are advising you to do the same. This does not mean that it is anticipated that you will be a named party in the litigation. As a possible third party, you should take all steps necessary to retain and preserve any and all documents (both hard copy and electronic) referring or relating in any way to the accident involving the drowning death of Trejon Fite, including but not limited to the following:

1. All documents created or maintained referring or relating to the accident;
2. All communications referring or relating to the accident;
3. All files/documents, stored on your computer, flash drive, discs, CDs, DVDs, or other removable media referring or relating to the accident;
4. All e-mail communications including your Inbox, Sent Items, Deleted Items and Personal folders referring or relating to the accident;
5. All audio recordings on tape or digitally preserved, including voice mail, referring or relating to the accident;
6. All pictures, both printed and stored, referring or relating to the accident and
7. All reports prepared by the State Engineer's Office.

451 SOUTH STATE STREET, ROOM 505, P.O. Box 145478, SALT LAKE CITY, UT 84114-5478
TELEPHONE: 801-535-7788 FAX: 801-535-7640



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This material should not be disposed of or deleted until we notify you that the litigation has concluded.

Your cooperation in this matter would be greatly appreciated. If you have any questions, please contact me at the phone number and address above.

Sincerely yours,

A handwritten signature in black ink, appearing to read "E. Russell Vetter". The signature is stylized with a large "E" and "R", followed by a "V" and a series of loops and strokes.

E. Russell Vetter
Senior City Attorney

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